

James L. Ahlstrom (8704)
Kara M. Houck (8815)
Austin D. Bybee (17956)
PARR BROWN GEE & LOVELESS, P.C.
101 South 200 East, Suite 700
Salt Lake City, Utah 84111-3105
Telephone: (801) 532-7840
jahlstrom@parrbrown.com
khouck@parrbrown.com

*Attorneys for Defendants Soar Energy, Inc., Brian Decker,
Cory Decker and Michael Machino*

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH**

WOLVES VENTURES, LLC, a Utah limited liability company, AVEYO DIRECT, LLC, a Utah limited liability company, and INSIGHT CONSULTING, LLC, a Utah limited liability company on behalf of themselves and derivatively on behalf of AVEYO SOARS, LLC, a Utah limited liability company,

Plaintiffs,

v.

SOAR ENERGY, INC., a California corporation, BRIAN DECKER, individually, CORY DECKER, individually, and MICHAEL MACHINO, individually,

Defendants.

**STIPULATION AND JOINT MOTION
FOR EXTENSION OF TIME FOR
DEFENDANTS SOAR ENERGY, INC.,
BRIAN DECKER, AND MICHAEL
MACHINO TO RESPOND TO
PLAINTIFFS' COMPLAINT**

Case No. 2:25-cv-00339-AMA

Judge Ann Marie McIff Allen

Magistrate Judge Cecilia M. Romero

Pursuant to Rule 6(b) of the Federal Rules of Civil Procedure, Defendants, on the one hand, and Plaintiffs, on the other hand, through their respective counsel of record, hereby stipulate and jointly move the Court to extend the due date through and including June 2, 2025, for Soar Energy, Inc. ("Soar Energy"), Brian Decker ("Brian"), and Michael Machino ("Machino") to file a

response to Plaintiffs' Complaint [Dkt. 1]. As good cause for the requested extension, counsel for the parties have been continuing to discuss the removal and venue for the claims. Accordingly, the Parties respectfully request that the Court enter an order extending the time for Soar Energy, Brian, and Machino to respond to the Complaint through and including June 2, 2025.

A proposed order is attached hereto as **Exhibit A**.

Respectfully submitted this 14th day of May 2025.

PARR BROWN GEE & LOVELESS, P.C.

By: /s/Kara M. Houck
James L. Ahlstrom
Kara M. Houck
Austin D. Bybee
Attorneys for Defendants

KUNZLER BEAN & ADAMSON

By: /s/ Chad S. Pehrson*
Chad S. Pehrson
Attorneys for Plaintiffs
**Electronically signed with permission*
via email

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 14th day of May 2025, a true and correct copy of the foregoing STIPULATION AND JOINT MOTION FOR EXTENSION OF TIME FOR DEFENDANTS SOAR ENERGY, INC., BRIAN DECKER, AND MICHAEL MACHINO TO RESPOND TO PLAINTIFFS' COMPLAINT was filed with the Clerk of the Court using the CM/ECT system and sent to the following via email:

Chad S. Pehrson (cpehrson@kba.law)
Alexis Nelson (anelson@kba.law)
KUNZLER BEAN & ADAMSON
50 West Broadway, Suite 1000
Salt Lake City, Utah 84101
Attorneys for Plaintiffs

/s/ Lori J. Stumpf
Legal Assistant